

Exhibit B

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Attorneys for Plaintiff
X Corp.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

X CORP., a Nevada corporation,

Plaintiff,

vs.

BRIGHT DATA LTD., an Israeli
corporation,

Defendant.

Case No. 3:23-cv-03698-WHA

**DECLARATION OF CELESTINE
ROSARIO SUSI IN SUPPORT OF X-
CORP.'S OPPOSITION TO BRIGHT
DATA LTD.'S MOTION FOR SUMMARY
JUDGMENT ON X'S BROWSER-WRAP
CLAIM**

Date: March 14, 2024
Time: 8:00 a.m.
Ctm: 12, 19th Floor

Hon. William Alsup

I, Celestine Rosario Susi, state and declare as follows:

1. I am a member of X Corp.'s Trust and Safety Team. I have worked at X Corp. (formerly Twitter, Inc.) since August 31, 2020. The facts set forth in this declaration are based on my personal knowledge derived from working at X Corp.

2. I have researched X Corp.'s records regarding the status of the following X accounts: @bright_data; @hola_org; @luminatinetwork; and @luminati_proxy, including the account holder email addresses, account creation dates, whether the account has been deactivated or remains live on the X platform and, if the account has ever been deactivated, the deactivation date. The results of my research are shown below:

a. Account Handle: @bright_data

Account Holder Email Address:	marketing@luminati.io
Prior Account Email Addresses:	rotemg@luminati.io or@hola.org mohammad@hola.org alon@hola.org
Creation Date:	Feb. 7, 2016
Deactivation Date:	September 24, 2023

b. Account Handle: @hola_org

Account Holder Email Addresses:	sysadmin@hola.org
Prior Account Email Addresses:	info@hola.org steve@hola.org
Creation Date:	Jan. 16, 2010
Deactivation Date:	N/A

c. Account Handle: @luminatinetwork

Account Holder Email Addresses:	philip@luminati.io
Prior Account Email Addresses:	mikedavison73@hotmail.com
Creation Date:	Feb. 29, 2016
Deactivation Date:	N/A

d. Account Handle: @luminati_proxy

Account Holder Email Addresses:	alon@luminati.io
Prior Account Email Addresses:	N/A
Creation Date:	Jan. 27, 2016
Initial Deactivation Date:	Feb. 7, 2016
Reactivation Date:	Feb. 7, 2016
Subsequent Deactivation Date	N/A

Pursuant to 17 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Colin F. Quinn

CELESTINE ROSARIO SUSI